## IN THE UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF TENNESSEE

IN RE:	)	
	)	Case No. 3:16-08398
DONALD ERNEST BRANDT,	)	Chapter 11
	)	Judge Randal S. Mashburn
Debtor.	)	

## RESPONSE OF DEBTOR TO THE MOTION OF FEDERAL NATIONAL MORTGAGE ASSOCIATION FOR RELIEF FROM STAY AND REQUEST FOR A HEARING THEREON

Comes the Debtor, through counsel, and for response to the motion of Federal National Mortgage Association for relief from stay and would object to said motion based on the equity in the real property, which is clearly evidence in the Movant's motion, as well as the fact that the property produces rental income which is necessary for an effective reorganization and requests a hearing thereon.

WHEREFORE, the Debtor, Donald Ernest Brandt, prays the motion filed herein be dismissed with costs, if any, taxed to the Movant.

Respectfully submitted,
/s/ Steven L. Lefkovitz, No. 5953
Steven L. Lefkovitz No. 5953
Attorney for Debtor
618 Church Street, Suite 410
Nashville, TN 37219
(615) 256-8300 (615)255-4516 fax
slefkovitz@lefkovitz.com

## **CERTIFICATE OF SERVICE**

I hereby certify that on February 24, 2017, a true and correct copy of the foregoing document was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served via regular U.S. mail, postage prepaid. Parties may access this filing through the Court's electronic filing system.

/s/ Steven L. Lefkovitz